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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SARAH TRACY, an individual,  
Plaintiff,

v.

CHURCHILL COUNTY JUSTICE OF  
THE PEACE BENJAMIN TROTTER, and  
CHURCHILL COUNTY, a political  
subdivision of the state of Nevada, et al.,  
Defendants.

Case No.: 3:24-cv-00288-ART-CSD

**STIPULATION AND ORDER FOR**  
**EXTENSION OF DISCOVERY**  
**DEADLINES**  
**[First Request]**

Plaintiff SARAH TRACY ("Plaintiff") and Defendants CHURCHILL COUNTY JUSTICE OF THE PEACE BENJAMIN TROTTER and CHURCHILL COUNTY ("Defendants") (collectively, the "Parties"), by and through their respective counsel, hereby stipulate and agree that the discovery cut-off and related deadlines in this case be extended for a period of 60 days.

This is the first request for an extension of these deadlines. This request is made in good faith and is not for the purpose of delay. Pursuant to LR 26-4, the parties provide the following information to the Court in connection with their request for an extension of discovery deadlines:

1 A. Statement of Discovery that has been Completed The parties have exchanged  
2 initial disclosures pursuant to FRCP 26(a). Plaintiff has served interrogatories and  
3 requests for production of documents on Defendant Churchill County.  
4

5 B. Description of the Discovery that Remains to be Completed The parties will  
6 need to complete written discovery, including additional requests for production,  
7 interrogatories, and requests for admission, and conduct depositions of the parties and  
8 witnesses. A number of the witnesses who likely need to be deposed are no longer  
9 employed by Churchill County and the parties are making efforts to identify these  
10 witnesses at this time and to secure their appearances at depositions. These witnesses  
11 include former employees who worked with Ms. Tracy during her tenure with Churchill  
12 County and/or the New River Township Justice Court.  
13

14 C. Proposed Schedule for Completing all Remaining Discovery

15 The parties would request that the Court grant their stipulation and extend the  
16 discovery and other deadlines in the case as follows::

17 1. Discovery Cut-Off Date:

- 18 - Existing: Monday, February 17, 2025  
19 - New: Friday, April 18, 2025  
20

21 2. Amending Pleadings and Adding Parties:

- 22 - Existing: Tuesday, November 19, 2024  
23 - New: Tuesday, January 21, 2025  
24

25 3. Expert Disclosures:

- 26 - Existing: Tuesday, November 19, 2024  
27 - New: Tuesday, January 21, 2025  
28

4. Rebuttal Expert Disclosures:

1 - Existing: Tuesday, December 31, 2024

2 - New: Monday, March 3, 2025

3 5. Dispositive Motions:

4 - Existing: Wednesday, March 19, 2025

5 - New: Monday, May 19, 2025

6 6. Joint Pretrial Order:

7 - Existing: Friday, April 18, 2025

8 - New: Wednesday, June 18, 2025

9 7. Extensions or Modifications of Discovery Plan:

10 - Existing: Monday, January 27, 2025

11 - New: Friday, March 28, 2025

12  
13  
14  
15 **IT IS SO STIPULATED.**

16 DATED: October 29, 2024

17 BY: /s/ Luke Busby, Esq.

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25 DATED: October 29, 2024

26 BY: /s/ Katherine Parks, Esq.

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: October 30, 2024